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**Attorneys for Plaintiff
Entropic Communications, LLC**

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ENTROPIC COMMUNICATIONS, LLC,

Plaintiff,

v.

DISH NETWORK CORPORATION, *et al.*,

Defendants.

Case No.: 2:23-cv-01043-JWH-KES
(Lead Case)

Case No.: 2:23-cv-01047-JWH-KES
(Related Case)

Case No.: 2:23-cv-01048-JWH-KES
(Related Case)

Case No.: 2:23-cv-05253-JWH-KES
(Related Case)

[Assigned to the Honorable John W.
Holcomb]

ENTROPIC COMMUNICATIONS, LLC,

Plaintiff,

v.

COX COMMUNICATIONS, INC., *et al.*,

Defendants.

**PLAINTIFF ENTROPIC'S
APPLICATION TO FILE
DOCUMENTS UNDER SEAL
REGARDING ENTROPIC'S
OPPOSITION TO COMCAST'S
MOTION TO DISMISS THE
CORRECTED SECOND AMENDED
AND SUPPLEMENTAL
COMPLAINT; DECLARATION OF
RACHEL BERMAN; [PROPOSED]
ORDER**

1 ENTROPIC COMMUNICATIONS, LLC,

2 Plaintiff,

3
4 v.

5 COMCAST CORPORATION, *et al.*,

6 Defendants.

7
8 ENTROPIC COMMUNICATIONS, LLC,

9 Plaintiff,

10
11 v.

12 DIRECTV, LLC, *et al.*,

13 Defendants.

TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Pursuant to Central District of California Local Rule 79-5.2.2(a), Plaintiff Entropic Communications, LLC (“Entropic” or “Plaintiff”) hereby applies for an order sealing **unredacted** information referenced in Entropic’s Opposition to Comcast’s Motion to Dismiss the Corrected Second Amended and Supplemental Complaint, which contains details related to a confidential third-party communication that has been filed under seal by Defendant Comcast.

Each portion of the document referenced in the chart below has been filed under seal by Defendant Comcast. *See* Decl. of Rachel Berman in Support of Entropic’s Application to File Documents Under Seal, ¶ 3. Entropic, therefore, applies to file such documents and information under seal pursuant to Local Rule 79-5.2.2(a).

The information to be sealed is identified below:

Item to be Sealed Pursuant to L.R. 79-5.2.2(a)	Description of Information
Portions of Entropic’s Opposition to Comcast’s Motion to Dismiss Corrected Second Amended and Supplemental Complaint (“Opposition”) at 23:10-16.	Contents of a confidential third-party business communication which Comcast has previously filed under seal.
Portions of Entropic’s Opposition at 24:4.	Contents of a confidential third-party business communication which Comcast has previously filed under seal.
Portions of Entropic’s Opposition at 24:13.	Contents of a confidential third-party business communication which Comcast has previously filed under seal.

1 Pursuant to Local Rule 79-5.2.2(a), Entropic applies to file under seal the
2 documents listed above. Under Rule 79-5.2.2(a), a party may seek leave to file a
3 document under seal so long as the Application describes the nature of the information
4 that should be closed to public inspection and is accompanied by: (1) a declaration
5 establishing good cause why the strong presumption of public access in civil cases
6 should be overcome and informing the Court whether anyone opposes the Application;
7 (2) a proposed order; (3) a redacted version of the relevant documents; and (4) an
8 unredacted version of the relevant documents. Entropic has complied with these
9 requirements. The information that Entropic seeks to seal is contained within a
10 confidential third-party business communication that Comcast sought to seal in relation
11 to its Motion to Dismiss. The public does not have an interest in accessing this
12 confidential information. Additionally, Entropic's request is narrowly tailored to only
13 prevent the public from viewing confidential information. Finally, counsel for Comcast
14 indicated that it did not intend to oppose Entropic's under seal filing. Berman Decl., ¶
15 6.

16 Therefore, compelling reasons exist to seal the highlighted portions of the above
17 documents. *See Aya Healthcare Servs., Inc. v. AMN Healthcare, Inc.*, 2020 WL
18 1911502, at *5 (S.D. Cal. Apr. 20, 2020) ("The Court agrees that compelling reasons
19 exist to seal references . . . to Defendants' proprietary business records that detail
20 sensitive financial terms, proprietary business strategies, and confidential negotiations
21 and agreements with third parties."); *In re Qualcomm Litig.*, 2019 WL 1557656, at *3
22 (S.D. Cal. Apr. 10, 2019) (granting motions to seal "confidential business information
23 of the parties, including trade secrets, proprietary business records, discussions of
24 internal strategy, company dealings, and materials designated as 'Highly
25 Confidential'").

26 Accordingly, Entropic respectfully requests that this Court order the unredacted
27 documents to be filed under seal. Concurrent with this filing, Entropic has filed redacted
28

versions of these documents with the Court, which only redact information necessary to protect confidential, private, and otherwise non-public information therein.

Dated: March 28, 2025

Respectfully Submitted,

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